Document 679

Filed 01/09/25

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**U.S. Department of Justice** 



United States Attorney Southern District of New York

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January 8, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/9/2025

## **MEMORANDUM ENDORSED**

The Honorable Gregory H. Woods United States District Judge Southern District of New York

500 Pearl Street New York, New York 10007

Re: United States v. Teamo Ebron, 22 Cr. 522 (GHW)

Dear Judge Woods:

The Government writes on behalf of itself and defendant Teamo Ebron to respectfully ask that the Court slightly modify the schedule for pre-trial briefing in this case. We have read and reviewed the Court's order on December 16, 2024 that noted the "Court does not expect to extend those deadlines," which were set on May 24, 2024. Because, as described below, a ten-day adjustment of the briefing deadlines may enable the parties to resolve the case before filing the submissions and thus be more efficient for the Court and parties, we nevertheless ask the Court for its consideration.

Plea discussions in this case were stalled as the defendant applied to the Young Adult Opportunity Program. Ultimately, on November 26, 2024, the parties were informed that the defendant was not accepted into the program. Since then, we have had multiple discussions about a plea resolution, and this evening a written plea offer was sent to the defendant. The offer is the Government's best and final offer, and it is available to the defendant for one week before it expires. If the offer is accepted, this will obviously eliminate the need for the parties to submit pretrial briefing and for the Court to review, consider, and decide the issues presented.

Accordingly, we ask that the Court permit the parties to file the pre-trial materials required by Rule 6 of the Court's Individual Rules of Practice in Criminal Cases on January 22, 2025, with opposition papers due on January 29, 2025, and replies due on February 3, 2025. The parties remain available for the final pretrial conference on February 13, 2025, but are also available the following week if that would be more convenient for the Court.

We recognize that the scheduling order in this case was entered in May 2024, but since the decision was made in late November not to admit the defendant to YAOP, the parties have been working to see if a resolution to the case is available. We respectfully ask for this modification in

the briefing schedule from the Court to give us a little more time to see if the case can be resolved without a trial.

Respectfully submitted,

EDWARD Y. KIM Acting United States Attorney

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Raymond Aab, Esq. (by ECF) cc:

> Application granted. The deadlines established in the Court's May 24, 2024 scheduling order, Dkt. No. 346 (the "Order") are modified as follows: Each deadline in the Order requiring the production or filing of materials on January 13, 2025 is modified to refer to February 22, 2025. All other deadlines established in the Order remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 677.

SO ORDERED.

Dated: January 9, 2025 New York, New York

United States District Judge